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March 2, 2017

**VIA ECF**

Honorable Vernon S. Broderick  
United States District Court for the  
Southern District of New York  
Thurgood Marshall United States Courthouse  
40 Foley Square, Courtroom 518  
New York, New York 10007

Re: Reggie Anders v. Verizon Commn'cs Inc., et al.  
SDNY Docket No. 16 Civ. 5654 (VSB)  
KM&M File No. 10503.00183

Dear Judge Broderick:

We represent Defendants Verizon Communications Inc. and Celco Partnership d/b/a Verizon Wireless in the above-referenced matter. We write jointly with Plaintiffs Reggie Anders and Underdog Trucking LLC ("Plaintiffs") and Defendants Rev. Al Sharpton and National Action Network. Per the Court's Order of February 16, 2017, the parties have met and conferred regarding a proposed briefing schedule for Plaintiffs' anticipated motion to file a Third Amended Complaint and Defendants' anticipated motions to dismiss the Second Amended Complaint.

In the interest of judicial efficiency, Defendants will consent to Plaintiffs filing a Third Amended Complaint, without prejudice to their rights to oppose or challenge the legal sufficiency of the complaint. The parties propose the following: Plaintiffs will file the Third Amended Complaint today. Defendants will file their anticipated motions to dismiss the Third Amended Complaint on or before April 3, 2017. Plaintiffs will then file their oppositions to the motions by April 17, 2017 and Defendants will file replies by May 1, 2017.



**VIA ECF**

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We thank the Court for its consideration of this matter.

Very truly yours,

/s/

Raymond G. McGuire

cc: Japheth N. Matemu, Esq.  
Wylie M. Stecklow, Esq.  
David A. Thompson, Esq.